



UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

KEVIN STANGE,

Defendant.

Case:2:22-cr-20558

Judge: Hood, Denise Page

MJ: Patti, Anthony P.

Filed: 10-25-2022 At 03:53 PM

USA V SEALED MATTER (LG)

Violations:

18 U.S.C. §§ 2251(a) and (e)

18 U.S.C. §§ 2252A(a)(5) and (b)(2)

18 U.S.C. §§ 2252A(a)(2) and (b)(1)

18 U.S.C. § 2253

INDICTMENT

THE GRAND JURY CHARGES:

COUNT ONE

***SEXUAL EXPLOITATION OF CHILDREN***  
**(18 U.S.C. §§ 2251(a), 2251(e))**

On or about March 14, 2022, in the Eastern District of Michigan, the defendant, KEVIN STANGE, employed, used, persuaded, induced, enticed and coerced MV-1, a prepubescent minor male, and MV-2, a prepubescent minor female, to engage in any sexually explicit conduct for the purpose of producing any visual depiction of such conduct; knowing and having reason to know that such visual depiction would be transported in and affecting interstate and foreign commerce; using

materials that have been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer; and the visual depiction was transported using any means and facility of interstate and foreign commerce; all in violation of Title 18, United States Code, Sections 2251(a) and 2251(e).

**COUNT TWO**  
***SEXUAL EXPLOITATION OF CHILDREN***  
**(18 U.S.C. §§ 2251(a), 2251(e))**

On or about March 14, 2022, in the Eastern District of Michigan, the defendant, KEVIN STANGE, employed, used, persuaded, induced, enticed and coerced MV-3, a prepubescent minor female, to engage in any sexually explicit conduct for the purpose of producing any visual depiction of such conduct; knowing and having reason to know that such visual depiction would be transported in and affecting interstate and foreign commerce; using materials that have been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer; and the visual depiction was transported using any means and facility of interstate and foreign commerce; all in violation of Title 18, United States Code, Sections 2251(a) and 2251(e).

**COUNT THREE**  
***POSSESSION OF CHILD PORNOGRAPHY***  
**(18 U.S.C. §§ 2252A(a)(5)(B), 2252A(b)(2))**

On or about July 28, 2022, within the Eastern District of Michigan, the defendant, KEVIN STANGE, knowingly possessed material that contained child pornography, as defined in 18 U.S.C. § 2256(8)(A); and the aforementioned child pornography had been mailed, shipped, and transported using a means and facility of interstate and foreign commerce, including a computer; and the aforementioned child pornography was produced using materials that had been mailed, shipped and transported in interstate and foreign commerce by any means, including a computer; and any of those images of child pornography involved a prepubescent minor and a minor who had not attained 12 years of age; in violation of Title 18 United States Code Sections 2252A(a)(5) and (b)(2).

**COUNT FOUR**  
***DISTRIBUTION OF CHILD PORNOGRAPHY***  
**(18 U.S.C. §§ 2252A(a)(2), 2252A(b)(1))**

On or about July 21, 2022, within the Eastern District of Michigan, the defendant, KEVIN STANGE, knowingly distributed material that contained child pornography, as defined in 18 U.S.C. § 2256(8)(A); and

the aforementioned child pornography had been mailed, shipped, and transported using a means and facility of interstate and foreign commerce, including a computer; and any of those images of child pornography involved a prepubescent minor and a minor who had not attained 12 years of age; in violation of Title 18 United States Code Sections 2252A(a)(2) and (b)(1).

**FORFEITURE ALLEGATIONS**  
**(18 U.S.C. § 2253)**

The allegations contained in Counts One through Four of this Indictment are hereby incorporated by reference for the purpose of alleging forfeiture pursuant to the provisions of 18 U.S.C. § 2253(a).

Upon conviction of the offenses alleged in this Indictment, KEVIN STANGE, shall, pursuant to 18 U.S.C. § 2253(a), forfeit to the United States the following:

- i. Any visual depiction described in 18 U.S.C. §§ 2251, 2251A, or 2252, 2252A, 2252B or 2260, or any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped, or received in violation of this chapter;
- ii. Any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such offense; and

- iii. Any property, real or personal, used or intended to be used to commit or to promote the commission of such offense or any property traceable to such property.

If any of the property described above as being subject to forfeiture pursuant to 18 U.S.C. § 2253, as a result of any act or omission of the defendant --

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred to, sold to, or deposited with a third party;
- c. has been placed beyond the jurisdiction of this Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

the United States of America, pursuant to 21 U.S.C. § 853(p), intends to seek forfeiture of all other property of the defendant up to the value of the property subject to forfeiture described in subparagraphs (a) through (e) above.

**THIS IS A TRUE BILL.**

*s/ Grand Jury Foreperson*  
GRAND JURY FOREPERSON

DAWN N. ISON  
United States Attorney

*s/ Brandy R. McMillion*  
BRANDY R. MCMILLION  
Chief, General Crimes Unit  
Assistant United States Attorney

*s/ Douglas C. Salzenstein*  
DOUGLAS C. SALZENSTEIN  
Deputy Chief, General Crimes Unit  
Assistant United States Attorney

Dated: October 25, 2022

United States District Court Eastern District of Michigan	<b>Criminal Case Cover Sheet</b>	Case Number
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NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to complete it accurately in all respects.

<b>Companion Case Information</b>	Companion Case Number:
This may be a companion case based upon LCrR 57.10 (b)(4) <sup>1</sup> :	Judge Assigned:
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	AUSA's Initials: <u>BRM</u>

Case Title: USA v. Kevin Stange

County where offense occurred : Washtenaw

Check One: ☒ Felony ☐ Misdemeanor ☐ Petty

☒ Indictment/ ☐ Information --- no prior complaint.  
☐ Indictment/ ☐ Information --- based upon prior complaint [Case number: \_\_\_\_\_]  
☐ Indictment/ ☐ Information --- based upon LCrR 57.10 (d) [Complete Superseding section below].

### Superseding Case Information

Superseding to Case No: \_\_\_\_\_ Judge: \_\_\_\_\_

- ☐ Corrects errors; no additional charges or defendants.  
☐ Involves, for plea purposes, different charges or adds counts.  
☐ Embraces same subject matter but adds the additional defendants or charges below:

<u>Defendant name</u>	<u>Charges</u>	<u>Prior Complaint (if applicable)</u>
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Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case.

October 25, 2022  
Date

  
 Brandy R. McMillion  
 Assistant United States Attorney  
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<sup>1</sup> Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, or (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.